

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

---

(1) CANDACE JEFFERSON, an  
individual

Plaintiff,

v.

(1) CITY OF DEL CITY, municipal  
corporation;  
(2) SHRI RADHA GOVIND, LLC  
d/b/a SPRINGHILL SUITES, a  
domestic limited liability company.

Defendants.

Case No. CIV-22-164-D

---

**NOTICE OF REMOVAL**

---

Defendants, City of Del City and Shri Radha Govind, LLC d/b/a Springhill Suites, by counsel, hereby file its Notice of Removal. In support, Defendants show the following grounds for removal:

1. Pursuant to 28 U.S.C. § 1332(a), 1441(a) and 1446 and LCvR 81.2, the City of Del City, Defendant, removes this action from the District Court of Oklahoma County, Oklahoma, styled *Candace Jefferson, an individual v. City of Del City, a municipal corp. and Shri Radha Govind, LLC d/b/a Springhill Suites, a domestic limited liability company*, Case No. CJ-2022-274.

**A. DIVERSITY OF THE PARTIES**

2. Plaintiff, Candace Jefferson, is a resident and citizen of and domiciled in the State of Texas. [Exh. 2, Petition, ¶ 1].

3. Defendant, City of Del City, is a municipal corporation in Oklahoma.

4. Defendant, Shri Radha Govind, LLC d/b/a Springhill Suites, is an Oklahoma limited liability company with its principal place of business in Oklahoma.

5. Complete diversity exists between the parties. *See* 28 U.S.C. § 1332(a).

**B. VENUE**

6. Venue is proper in this Court for purposes of removal. Plaintiff brought this action in the District Court of Oklahoma County, Oklahoma – located within the federal judicial district for the Western District of Oklahoma. 28 U.S.C. § 116(c). [Exh. 1, OSCN Court Docket Sheet]. Therefore, venue is proper because this Court is the federal “district and division embracing the place where such action is pending.” 28 U.S.C. § 1441(a).

**C. AMOUNT IN CONTROVERSY**

7. Plaintiff seeks judgment against the Defendants for damages in excess of \$75,000.00 [Exh. 2, Petition, Prayer for Relief, ¶ 1]. Therefore, the amount in controversy exceeds \$75,000.00. *See* 28 U.S.C. § 1446(c)(2).

**D. TIMELINESS OF REMOVAL**

8. Defendant, City of Del City, was served February 9, 2022. Therefore, Del City timely files this Notice of Removal within 30 days after service of summons upon him pursuant to 28 U.S.C. § 1446(b).

9. Defendant, Shri Rahda Govind, LLC d/b/a Springhill Suites, was served on February 9, 2022. Therefore, Springhill Suites timely files this Notice of Removal within 30 days after service of summons upon it pursuant to 28 U.S.C. § 1446(b).

**E. MISCELLANEOUS**

10. Pursuant to 28 U.S.C. § 1446(a), copies “of all process, pleadings and orders served upon” the Defendants in the aforementioned state action are identified and attached.

11. Pursuant to LCvR 81.2(a), a copy of the state court docket sheet is attached hereto [Exh. 1].

12. Pursuant to LCvR 81.1, jury trial is hereby demanded.

13. Defendant will promptly give written notice of the filing of this Notice of Removal to Plaintiff’s counsel and file a copy of the Notice of Removal with the Court Clerk for Oklahoma County, Oklahoma, as required.

14. If this Court identifies a defect in this Notice of Removal, Defendant, City of Del City, respectfully requests the Court grant it leave to amend this Notice to cure the defect. *See Hendrix v. New Amsterdam Cas. Co.*, 390 F.2d 299, 301-302 (10th Cir. 1968).

Respectfully submitted,

s/ Charlie Schreck  
Randall J. Wood, OBA #10531  
Charles A. Schreck, OBA #32863  
PIERCE COUCH HENDRICKSON  
BAYSINGER & GREEN, L.L.P.  
1109 N. Francis Avenue  
Oklahoma City, OK 73106  
Telephone: (405) 235-1611  
Facsimile: (405) 235-2904  
rwood@piercecouch.com  
cschreck@piercecouch.com  
***Attorneys for Defendant***  
***City of Del City***

**CERTIFICATE OF SERVICE**

This is to certify that on February 25, 2022, I electronically transmitted the above document to the Clerk of the Court using the ECF System for filing, and also mailed a copy via electronic mail to counsel shown below. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Damario Solomon-Simmons: dss@solomon-simmons.com

Kymberli J.M. Heckenkemper: kheckenkemper@solomon-simmons.com

*Attorneys for Plaintiff*

*s/Charlie Schreck*

Charles A. Schreck